| **Temporary Authorization Request Title:** | Class 2 Hazardous Waste Permit Modification Request, Waste Transfer Station Container Storage Limit Increase |
| **Prepared:** | November 2021 |
| **Request Prepared by:** | Blue Grass Army Depot (BGAD) and Blue Grass Chemical Agent-Destruction Pilot Plant (BGCAPP) |
| **On Behalf of:** | U.S. Army Assembled Chemical Weapons Alternatives (ACWA) |
| **Submitted to:** | Kentucky Department for Environmental Protection Division of Waste Management 300 Sower Blvd. Frankfort, Kentucky 40601-1190 |
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BGAD/BGCAPP
TEMPORARY AUTHORIZATION REQUEST

This temporary authorization requests increase in waste container storage capacity limit at the Waste Transfer Station (WTS) located at BGAD and operated by BGCAPP.

1.0 INTRODUCTION

BGAD and BPBG jointly submit to the Kentucky Department for Environmental Protection (KDEP) this temporary authorization request under the Resource Conservation and Recovery Act (RCRA) to allow increase in waste container storage capacity limit at the WTS as identified in Resource Conservation and Recovery Act (RCRA) Class 2 Hazardous Waste Storage & Treatment Permit Modification Request, Treatment of GB Rockets and Waste Transfer Station Container Storage Limit Increase for the Blue Grass Chemical Agent-Destruction Pilot Plant Blue Grass Army Depot, Richmond, Kentucky, EPA ID KY8-213-820-105, submitted on November 11, 2021. This temporary authorization request was prepared pursuant to Title 401 Kentucky Administrative Regulations (KAR) Chapter 39:060 Section 5 and 40 CFR 270.42(e).

2.0 BACKGROUND

The WTS identified in the class 2 permit modification request submitted to KDEP contains requirements and justification for increasing the container storage capacity of the WTS. Authorization to use the increased container storage capacity is sought under this temporary authorization request (TAR).

3.0 RATIONALE FOR AND DESCRIPTION OF TEMPORARY AUTHORIZATION REQUEST

Approval of the temporary authorization request will allow use of the increased container storage capacity at the WTS while the RCRA Class 2 permit modification request continues to be reviewed and processed by KDEP.

The WTS is currently permitted for storage of the following amounts of various secondary wastes generated at BGCAPP:

- WTS building area can store up to 24,000 gallons
- Tanker storage area can store up to 120,000 gallons, and;
- Bulk solids storage area can store up to 32,500 gallons.

Shipping and firing tube (SFT) segments, including the end cap, are removed from the warhead section of M55 rockets in the Munitions Demilitarization Building (MDB). The SFTs are placed in transfer boxes prior to being monitored in the boxes by MINICAMS® in the Motor Packing Room (MPR) airlock. Once cleared out of the airlock, the SFTs are moved from the transfer boxes to roll-offs. The roll-offs are stored at the WTS facility prior to being shipped offsite for disposal.
Initial project plans were to dispose of the SFT segments with end caps in an approved polychlorinated biphenyl (PCB) landfill. Per additional guidance received by BGCAPP from the Program Executive Office, Assembled Chemical Weapons Alternatives (PEO ACWA) regarding Chemical Weapons Convention (CWC) Treaty requirements, intact SFT end caps must undergo further treatment leading to deformation prior to disposal. Until recently, the end cap deformation requirement was under negotiation between CWC and the United States Department of State (State Department). However, the challenge to the deformation requirement has been dropped by State Department, and it remains in place. Veolia North America in Port Arthur, Texas, will receive and dispose of the SFTs, including providing the additional step of treatment and deformation of the SFT end caps to meet CWC Treaty requirement. End cap deformation will also be potentially provided onsite at BGCAPP prior to shipment of the SFTs and end caps to Veolia, allowing them to perform direct landfill disposal.

A maximum of seven (7) roll-offs (up to 32,500 gallons) can currently be placed in the WTS permitted container storage area prior to shipment for disposal. With the rocket handling equipment configuration change in the MDB, SFT segments and full roll-offs will potentially be generated at a higher rate. As each roll-off contains approximately 600 SFT segments, the increased generation rate will necessitate increased SFT roll-off storage at the WTS to allow sufficient time for shipment planning and transportation documentation preparation. In addition, this increased capacity limit is needed to serve as contingency storage in the event of issues (e.g., COVID-19 case surge) associated with roll-off transport and receipt by Veolia: otherwise, MDB rocket operations will be required to stop until a roll-off can be shipped offsite. Finally, increased roll-off storage at the WTS is required to:

- allow segregation of roll-offs containing end caps that have been deformed onsite and can be disposed directly by Veolia from those that will require deformation and treatment at Veolia prior to disposal; and,
- support roll-off storage of decontaminated MDB equipment, debris, and other secondary wastes monitored to <0.7 Vapor Screening Level (VSL) to be shipped offsite for treatment and disposal.

The WTS facility has sufficient area to accommodate the storage of additional roll-offs. Consequently, an increase in the WTS container bulk solids storage limit by 102,500 gallons to 135,000 gallons, with total storage of 279,000 gallons is requested. Both BGCAPP and BGAD are requesting this temporary authorization be approved on or before December 13, 2021.

4.0 COMPLIANCE WITH 40 CFR 270 AND 401 KAR 38:040

This authorization request, in conjunction with the previously submitted Class 2 permit modification request, complies with temporary authorization requirements in Title 401 KAR Chapter 39:060 Section 5 and 40 CFR 270.42(e), specifically 40 CFR 270.42(e)(2)(ii) and 40 CFR 270.42(e)(3)(ii)(E). The TAR enhances the protection of the workforce and the public by ensuring the WTS can receive wastes in sufficient capacity to support BGCAPP facility operations.

5.0 NOTIFICATION REQUIREMENTS AND CHANGES

To meet the notification requirements in 40 CFR 270.42 (e)(2)(iii), the BGAD/BGCAPP team will send a notice regarding the temporary authorization request to all persons on the facility mailing list within seven days of submitting this request to KDEP.